

NO. 13-19-00500-CV

FILED IN
IN THE COURT OF APPEALS FOR THE THIRTEENTH DISTRICT OF TEXAS
CORPUS CHRISTI/EDINBURG, TEXAS

11/10/2020 4:11:26 PM

KATHY S. MILLS
TEXAS AUTO SALVAGE, INC., GARY HACK AND DANIEL HACK, APPELLANTS
Clerk

VS.

DD RAMIREZ, INC., DANNY RAMIREZ RECYCLING, INC., SAN ANTONIO AUTO &
TRUCK SALVAGE, DANNY'S RECYCLING & PRECIOUS METALS, LLC, DANNY'S
RECYCLING, INC., AND DANIEL DELAGARZA RAMIREZ, APPELLEES

ON APPEAL FROM THE 37TH JUDICIAL DISTRICT COURT OF
BEXAR COUNTY, TEXAS
CAUSE No. 2010-CI-02500
THE HONORABLE MICHAEL MERY, PRESIDING

**APPELLANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE REPLY BRIEF OF APPELLANTS**

TO THE HONORABLE JUSTICES OF SAID COURT:

Appellants, Texas Auto Salvage, Inc., Gary Hack and Daniel Hack, ("Appellants") respectfully submit this Unopposed Motion for Extension of Time to File Reply Brief of Appellants. Appellants request 45-day extension of time to **Friday, December 27, 2020**, to file Reply Brief of Appellants. In compliance with Texas Rules of Appellate Procedure 10.5(b)(3), Appellants state the following:

I.

Appellants' Reply Brief is due **November 12, 2020**. Appellants have not previously requested any extensions to file their reply brief.

II.

Several factors will prevent counsel for Appellants from completing the Reply Brief by the current deadline, including but not limited to:

1. Counsel previously prepared a response to a Petition for Review in Case No. 19-1112, *Armando Montelongo, Jr. et al. v. Cecil G Abrea et al.* in the Texas Supreme Court.
2. Counsel is drafting the Brief of Appellant in Cause No. 04-20-00383-CV, *In the Interest of L.S. and W.S., Children*, which is due November 30, 2020.
3. Counsel is drafting the Reply Brief and Brief of Appellee in Cause No. NO. 04-20-00051-CV, *MedFinManager LLC v. Salas*, which is due November 20, 2020.
4. Counsel has recently prepared (i) the Brief of Appellee in Cause No. 03-20-00126-CV, *Francesca Scanio Stacey v. Selina Shadd, Trustee and Power of Attorney of Juliet Spreen* in the Third Court of Appeals and (ii) the Brief of Appellant in Cause No. 13-19-00500-CV, *Texas Auto Salvage v. Danny Ramirez*.
5. Counsel has been required to allocate time during the work day for an extensive project with a deadline of November 3, 2020.
6. Counsel has been addressing issues arising from the impact of COVID-19 on the practice of law.

III.

For the above reasons, Appellants request an extension of 45 days to file their Reply Brief. This extension is not sought for purposes of delay. It is needed because of the previously mentioned matters and commitments, and so that justice will be done.

Counsel for Appellants has conferred with Counsel for Appellees and they have indicated that they do not oppose the motion.

WHEREFORE, Appellants, Texas Auto Salvage, Inc., Gary Hack and Daniel Hack pray that this motion be granted and that time for filing Brief of Appellants be extended 45-days December 27, 2020 and grant Appellants all other relief to which they may be entitled.

Respectfully submitted,

/s/ Renée Yanta

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**Appellate Counsel for Appellants,
Texas Auto Salvage, Inc., Gary Hack and
Daniel Hack**

CERTIFICATE OF CONFERENCE

I certify that I conferred with Appellees' counsel, Samuel Houston, regarding this motion. Appellees' counsel are unopposed to this motion.

/s/ Renée Yanta
Renée Yanta
ATTORNEY FOR APPELLANTS

CERTIFICATE OF SERVICE

This is to certify that the above and foregoing document was forwarded via efile service, on November 10, 2020, to the following counsel of record:

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